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December 23, 2015

Via Electronic Filing

Ms Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CG Docket No. 10-51: Structure and Practices of the Video Relay Service Program; and
CG Docket No. 03-123: Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities

Dear Ms Dortch:

In the past ten years, the contribution base of the telecommunications relay services shrank from about \$80 billion to \$60 billion, which represents a reduction of 25% despite the tremendous increase in the number of cell phones and cell phone users. In the same period, the total cost of telecommunications relay services other than intrastate relay services doubled. This has resulted in a tripling of the contribution rate of the telecommunications industry from approximately half of one percent to approximately 1.6 percent.

Instead of continuing ways and means to minimize the costs of relay services at the expense of quality, I propose that the Federal Communications Commission do the following:

1. Audit the telecommunications contribution base instead of having the telecommunications industry perform their own self-audits;
2. Include Internet Providers as part of the contribution base as the Internet is the largest carrier of telecommunications relay services; and
3. Restore the separation of intra- and inter-state calls as the accuracy of points of origins are more valid due to significant improvement in the technology and have the states assume the responsibility of covering the intra-state relay calls.

Respectfully yours,
Alfred Sonnenstrahl
Former TDI Executive Director